

Report Year  
Modification Certification

**Reporting Year Tonnage Modification Request and Certification**

(New 06-00)

Board Meeting

Agenda Item

May 22-23, 2001

Attachment 2

To request a reporting year tonnage modification used in calculating the diversion rate for your jurisdiction, please complete and sign this form and return it to your Office of Local Assistance (OLA) representative at the address below, and any additional information requested by OLA staff. OLA staff will review your request as part of the Annual Report/Biennial Review process; therefore, it is recommended that this form be included as part of your Annual Report to the California Integrated Waste Management Board (Board.)

Please be advised that the Biennial Review is not only a review of whether a jurisdiction has met their diversion rate requirement, but also an evaluation of a jurisdiction's progress in implementing the selected programs identified in their Source Reduction and Recycling Element (SRRE) and Household Hazardous Waste Element.


If you have any questions about the certification process, or how to fill out this form, please call your OLA representative at (916) 255-2555.

Mail completed documents to:

California Integrated Waste Management Board  
Office of Local Assistance, MS-8  
8800 Cal Center Drive  
Sacramento, CA 95826

**General Instructions:**

Please complete both Section I and Section II, and all other applicable subsections.

Section I: Jurisdiction Information and Certification			
I certify under penalty of perjury that the information in this document is true and correct to the best of my knowledge, and that I am authorized to make this certification on behalf of:			
Jurisdiction Name <b>TOWN OF MAMMOTH LAKES</b>		County <b>COUNTY OF MONO</b>	
Authorized Signature 		Title <b>Administrative Analyst</b>	
Type/Print Name of Person Signing <b>Michael A. Grossblatt</b>	Date	Phone <b>(760) 934-8989 x266</b>	
Person Completing This Form (please print or type) <b>Jim Greco</b>	Title <b>Owner/Principal</b>	Phone <b>(916) 933-2327</b>	
Mailing Address <b>California Waste Associates P.O. Box 5177</b>	City <b>El Dorado Hills</b>	State <b>CA</b>	ZIP Code <b>95762</b>

**Section II: Information for Modification of Existing Reporting Year Tonnage**

*If requesting more than one type of reporting year tonnage modification, please copy Section II and complete all applicable subsections for each reporting year inaccuracy selected in A5.*

A1. Reporting year to be corrected:	A2. Current tonnage as reported to the CIWMB:	A3. Increased or decreased tons requested:	A4. Proposed total reporting year generation tons requested:
1995	5,583	10,668	16,251

A5. Statute (PRC Section 41031-41033, 41331-41333), Regulation (14CCR Section 18722 et seq., 18800 et seq), and Board Policy (modification methods as outlined in the March 27, 1997 Board-approved "Agenda Item 32") allow for reporting year tonnage modifications. Please state the nature of the reporting year tonnage inaccuracy. Check all that apply. (Information regarding the Statute, Regulation and "Agenda Item 32" are available on internet at <http://www.ciwmb.ca.gov/Law.htm>)

- ☐ Disposed waste actually generated in another jurisdiction.
- ☒ Disposal tonnage number miscalculated.
- ☐ Disposal mandated by federal or state agency policy, order, or contract.
- ☐ Non-hazardous designated waste tonnage modification. (Please also answer question A14 if you check this box.)
- ☐ Waste disposal from a declared disaster or public emergency.
- ☐ Waste exported out-of-state and later diverted.
- ☐ Residual waste from regional diversion facility. (Please reference PRC Section 41782. (a)(2)(A) for additional reporting year tonnage modification requirements.)
- ☐ Residual waste from regional medical waste treatment facility. (Please reference PRC Section 41782. (a)(1) for additional reporting year tonnage modification requirements.)
- ☐ Other reporting year tonnage inaccuracy not specifically outlined in statute, or "Agenda Item 32". Please explain in detail below, including your proposed tonnage modification method.

Disposal tonnage at Benton Crossing Landfill was under-reported. Per capita and comparative analyses re-inforced suspected under-reporting. BOE audit report confirmed under-reporting.

Derivation of increased disposal tons was uniformly applied to 5 other County-operated disposal sites.

A6. Does the inaccuracy checked in section A5 meet the statutory and regulatory criteria and definitions to qualify for a tonnage modification? Please explain your findings below.

Yes. Under reported disposal tonnage was taken from wrong forms and applied to the quarterly disposal reporting system. Disposal sites did not have attendants or scales during early 1990's. BOE audit during 1995-1996 derived corrected tons.

A7. The combined documentation supporting this certification form contains the following:

- > States problem claimed in section A5.
  - > States tonnage modification amount claimed.
  - > Totals add up to tonnage claimed in section A3.
  - > Address, title of entity, and signature of individual with knowledge regarding the tonnage modification.
- ☒ Yes.
- ☐ No, please explain in detail below.

A8. In the table below, list the data records that support your claim and are available for Board review. Include type of record and location; for example, weight tickets from transfer station or a signed letter on official letterhead indicating where the waste tonnage originated (i.e. jurisdiction-of-origin).

Source of Disposal Data	Tons	Type of Record	Location of Data
BOE (1995)	10,668	Audit Report	Monroe County DPW
BOE (1996)	1,370	" "	" " "
Please see section 3.0 of "Final Report for Compliance Order"			

A9. If the tonnage modification is due to misreporting or a miscalculation, how has the problem been resolved so that the error does not occur again?

Recently hired Town Administrative Analyst is responsible for monitoring AS 939 responsibilities and activities. A system has been developed by the County to more accurately record disposal tonnage.

A10. If the tonnage modification is being attributed to another jurisdiction or to a miscalculation, have you notified the affected parties (jurisdictions, haulers, counties, and landfill operators) in writing regarding the problem and your pending claim to the Board?

☐ Yes.

☐ No, please explain in detail below.

☒ N/A

A11. Please indicate from what documented source the tonnage requested in Box A3 came:

☒ All tons claimed are from actual documented numbers from hauler, self-haul, or other tonnage. *BOE, LF operator.*

☐ Some data were estimated or extrapolated from representative sampling. (Explain the amount and method in detail.)

A12. Enter your diversion rates in the table below.

Current Board default calculated diversion rate: Reporting Year: <u>1995</u>	77 %
Proposed diversion rate:	33 %

A13. If the proposed reporting year tonnage modification results in an increase in your waste diversion rate, please explain how your diversion rate is consistent with your level of SRRE program implementation. For example, does your new diversion percentage reflect the recycling and diversion programs you have implemented in your jurisdiction?

N/A

A14. In the space below please describe your efforts to divert the non-hazardous designated waste material prior to this tonnage modification request. (This question is only applicable if you checked the non-hazardous designated waste tonnage modification box in subsection A5.)

N/A

**Reporting Year Tonnage Modification Request and Certification**

(New 06-00)

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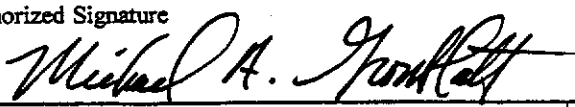
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Jurisdiction Name <b>TOWN OF MAMMOTH LAKES</b>		County <b>COUNTY OF MONO</b>	
Authorized Signature 		Title <b>Administrative Analyst</b>	
Type/Print Name of Person Signing <b>Michael A. Grossblatt</b>	Date	Phone <b>(760) 934-8989 X266</b>	
Person Completing This Form (please print or type) <b>Jim Greco</b>	Title <b>Owner/Principal</b>	Phone <b>(916) 933-2327</b>	
Mailing Address <b>California Waste Associates P.O. Box 5177</b>	City <b>El Dorado Hills</b>	State <b>CA</b>	ZIP Code <b>95762</b>

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A1. Reporting year to be corrected:	A2. Current tonnage as reported to the CIWMB:	A3. Increased or decreased tons requested:	A4. Proposed total reporting year generation tons requested:
1996	15,373	1,370	16,743

A5. Statute (PRC Section 41031-41033, 41331-41333), Regulation (14CCR Section 18722 et seq., 18800 et seq), and Board Policy (modification methods as outlined in the March 27, 1997 Board-approved "Agenda Item 32") allow for reporting year tonnage modifications. Please state the nature of the reporting year tonnage inaccuracy. Check all that apply. (Information regarding the Statute, Regulation and "Agenda Item 32" are available on internet at <http://www.ciwmb.ca.gov/Law.htm>)

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☐ Yes.

☐ No, please explain in detail below.

☒ N/A

A11. Please indicate from what documented source the tonnage requested in Box A3 came:

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☐ Some data were estimated or extrapolated from representative sampling. (Explain the amount and method in detail.)

A12. Enter your diversion rates in the table below.

Current Board default calculated diversion rate:	
Reporting Year: <i>1994</i>	<i>36</i> %
Proposed diversion rate:	<i>30</i> %

A13. If the proposed reporting year tonnage modification results in an increase in your waste diversion rate, please explain how your diversion rate is consistent with your level of SRRE program implementation. For example, does your new diversion percentage reflect the recycling and diversion programs you have implemented in your jurisdiction?

*N/A*

A14. In the space below please describe your efforts to divert the non-hazardous designated waste material prior to this tonnage modification request. (This question is only applicable if you checked the non-hazardous designated waste tonnage modification box in subsection A5.)

*N/A*



May 22-23, 2001

A6. Does the inaccuracy checked in section A5 meet the statutory and regulatory criteria and definitions to qualify for a tonnage modification? Please explain your findings below.

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A7. The combined documentation supporting this certification form contains the following:

- > States problem claimed in section A5.
- > States tonnage modification amount claimed.
- > Totals add up to tonnage claimed in section A3.
- > Address, title of entity, and signature of individual with knowledge regarding the tonnage modification.

☒ Yes.

☐ No, please explain in detail below.

A8. In the table below, list the data records that support your claim and are available for Board review. Include type of record and location; for example, weight tickets from transfer station or a signed letter on official letterhead indicating where the waste tonnage originated (i.e. jurisdiction-of-origin).

Source of Disposal Data	Tons	Type of Record	Location of Data
BOE (1995)	10,668	Audit Report	Monroe County DPW
BOE (1996)	1,370	" "	" " "
Please see section 3.0 of "Final Report for Compliance Order"			

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### 3.0 CORRECTIONS TO INACCURATE DISPOSAL REPORTING

#### OVERVIEW

Figure 1 shows the location of the disposal sites in the county. The Benton Crossing Landfill is the only disposal facility typically used by the Town.

The Town of Mammoth Lakes has a year-round resident population base of about 5,300. However, because of the influx of skiers and visitors to Mammoth Mountain, the equivalent year-round population approximates 17,000 according to the Mammoth Community Water District. The District's estimates are based upon sewer flows.

The top ten businesses within the Town's boundaries, ranked by sales tax receipts, are:

- Mammoth Mountain Ski Area (22% of total sales tax receipts in the Town)
- Vons Grocery Store (7%)
- Polo Ralph Lauren Clothing Store (3%)
- Footloose Sports (3%)
- Whiskey Creek at Mammoth Restaurant (3%)
- Mammoth Shell Mart Service Station (2.5%)
- Mammoth Sporting Goods (2.5%)
- Wave Rave Snowboard Shop (2%)
- Mammoth Automotive Towing (2%)
- Rite Aid (2%)

The aggregated sales tax receipts for these ten businesses approximate half of the total sales tax received by the Town.

The CIWMB approved the Town's Source Reduction and Recycling Element (SRRE) on July 26, 1995. The Town's current base year is 1991. Its CIWMB-approved base year waste generation is 21,036 tons. The population of the Town in 1991 was 5,300, which results in a per capita waste generation rate of 23.52 pounds per person per day (ppd). This is very high for California jurisdictions. The statewide average is approximately 8 ppd. Rural jurisdictions, according to a CIWMB report, approximate 7 ppd.

Residential waste is approximately 24% of the total waste stream waste generation. The base year residential waste generation per capita is about 5.65 ppd for the Town. The SRRE reported that the maximum number of people at any one time in Town occurs during major ski weekends and holidays. At that time, approximately 29,000 persons are estimated to be in the Town.

The Town's Administrative Analyst estimates that the Mammoth Mountain Ski Resort attracts 20,000 to 25,000 visitors per weekend day (6,000 skiers per week day) during the most popular times during the ski season. This significantly increases waste generation.

As noted earlier, the Mammoth Community Water District estimated that the equivalent year-round population of the Town is about 17,000. Using this population estimate reduces the per capita waste generation to 6.78 ppd. This inferred that perhaps the base year waste generation was accurate and that the measurement problem may be due to inaccurate disposal tonnage allocation.

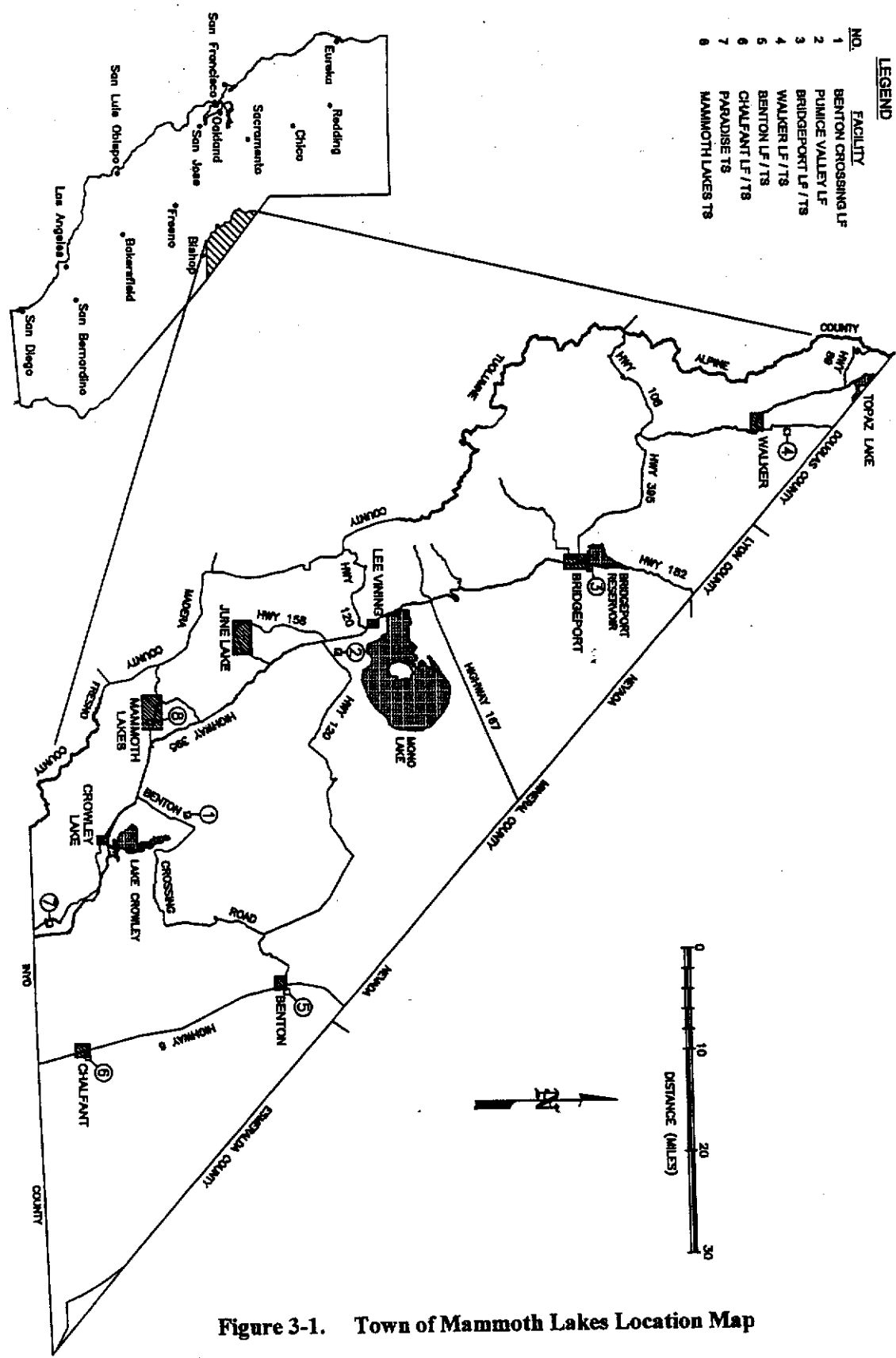


Figure <b>1</b>	CIWMB COMPLIANCE ORDER COUNTYWIDE SOLID WASTE PROGRAM Mono County, California  WASTE FACILITY LOCATION MAP	MONO COUNTY PUBLIC WORKS DEPARTMENT		
		Drawing Date:	7/14/00	Rev.#
		Prepared By:	E. Nikirk	Date
		Checked By:	E. Nikirk	Revision
		Approved By:	R. Boardman	

CWA was reviewing the Town's demographics when it determined that the base year waste generation, though yielding a high per capita generation rate for both the Town and the County, was not the source of the inaccuracies in diversion measurement. On the contrary, CWA's analysis inferred that perhaps the base year waste generation was accurate and that the measurement problem may be due to either inaccurate disposal tonnage allocation between the Town and County or mis-reported disposal quantities to the Town, particularly for 1995.

### ANALYSIS OF REPORTED DISPOSAL TONNAGE

Scales were installed at the Benton Crossing Landfill in mid-1998. The operator began recording received disposal tonnage in September, 1998. Prior to that time the volume of waste disposed was estimated and a conversion factor (1,000 pounds per cubic yard) was used to calculate tons. Volume is still the basis for determining disposal quantities at the County's other disposal facilities.

Table 3-1 depicts the estimated base year disposal tonnage and the disposal tonnage recorded by the CIWMB in its Quarterly Disposal Reporting System (QDRS) for the years 1995 through 1999. All of the Town's disposal tonnage was disposed at the Benton Crossing Landfill. This landfill also received some waste from unincorporated areas of the county in the vicinity of the landfill. The data for each quarter, as recorded by the CIWMB in its website, is included in Appendix C.

**Table 3-1. Reported Disposal Tonnage for the Town at the BCLF for the Period 1995 - 1999**

Period	1991	1995	1996	1997	1998	1999
1st Quarter	n/a	740	2,059	3,568	4,055	2,907
2nd Quarter	n/a	1,493	4,969	4,753	6,364	6,041
3rd Quarter	n/a	950	4,662	5,386	5,843	5,735
4th Quarter	n/a	2,400	3,684	4,638	4,458	3,834
<b>Total Disposal</b>	<b>20,087</b>	<b>5,583</b>	<b>15,374</b>	<b>18,345</b>	<b>20,720</b>	<b>18,517</b>
Measurement	Quantity Estimated by Volume and Converted to Tons				Started Weighing in 9/98	
<b>Diversion Rate</b>	<b>5%</b>	<b>77%</b>	<b>36%</b>	<b>25%</b>	<b>20%</b>	<b>32%</b>

The disposal data presented in Table 3-1 for 1995 was compared to 1996. The comparison reveals the unrealistically low 1995 reported tonnage. This trend was also observed for the other County-operated landfills for 1995 and 1996. This prompted further review. Consequently, the disposal data for 1995 was scrutinized further.

Table 3-2 depicts the disposal tonnage reported to the Board of Equalization (BOE) by quarter for 1995 and 1996. The BOE data came from the CIWMB website. Pages from the website which show the disposal tonnage initially recorded for the Benton Crossing Landfill is included in Appendix D.

This disposal tonnage was further allocated by the County according to the Jurisdiction Allocation (JA) Forms between the Town and the unincorporated county area surrounding the Town. For six consecutive quarters the percentage of the waste received at the Benton Crossing Landfill allocated to the Town was 95%. The percentage

decreases in the last two quarters of 1996 to 90% and 87%, respectively.

**Table 3-2. Disposal Tonnage Recorded by CIWMB from Initial BOE Reports with Percentage Allocations Derived for the Town for the Benton Crossing Landfill in 1995 and 1996**

Period	1995				1996			
	Total	County	Town	% Town	Total	County	Town	% County
1st Quarter	779	39	740	95%	2,167	108	2,059	95%
2nd Quarter	1,572	79	1,493	95%	5,230	262	4,969	95%
3rd Quarter	1,000	50	950	95%	5,180	518	4,662	90%
4th Quarter	2,526	126	2,400	95%	4,235	551	3,684	87%
<b>Total</b>	<b>5,877</b>	<b>294</b>	<b>5,583</b>	<b>95%</b>	<b>16,812</b>	<b>1,439</b>	<b>15,374</b>	<b>91%</b>

The JA Forms are included in Appendix E.

The SRRE for the Town (dated July 1992) reported that it had been estimated that approximately 90% of the municipal solid waste, construction and slash waste, and other special wastes entering the Benton Crossing Landfill were generated within Town limits.

The JA Forms were completed by using data recorded by the landfill operator from "waste origin forms". The operator conducted waste origin surveys during the standard survey weeks (the 8th through the 14th of the last month in each quarter). The forms for all four quarters of 1995 are presented in Appendix F.

The data is compiled in Table 3-3.

**Table 3-3. Disposal Tonnage Recorded by Benton Crossing Landfill Operator from Origin Surveys in 1995 and 1996**

Period	1995				1996			
	Total	County	Town	% County	Total	County	Town	% Town
1st Quarter	5,150	573	4,577	11%		NA *	NA *	
2nd Quarter	4,273	122	4,151	3%		NA *	NA *	
3rd Quarter	5,265	436	4,829	8%		NA *	NA *	
4th Quarter	6,271	773	5,498	12%		NA *	NA *	
<b>Total</b>	<b>20,959</b>	<b>1,904</b>	<b>19,055</b>	<b>9%</b>				

\* NA - Not Available.

The disposal weights recorded in the origin survey forms differed significantly from the JA Forms and what was recorded by the CIWMB in its QDRS.

Additional research into the estimated disposal received at the Benton Crossing Landfill revealed that the BOE conducted an audit of the Benton Crossing Landfill from the 2nd quarter of 1994 through the 4th quarter of 1996. Table 3-4 compares the reported BOE disposal quantities, the audit results, and the origin survey data.

The BOE Audit report is included in Appendix G.

**Table 3-4. Comparison of BOE Audit with Previously Reported Tons and the Origin Survey Results (Benton Crossing Landfill)**

Period	1995			1996		
	Previously Reported to BOE	BOE Audit	Origin Survey	Previously Reported to BOE	BOE Audit	Origin Survey
1st Quarter	779	4,298	5,150	2,167	3,760	NA *
2nd Quarter	1,572	4,948	4,273	5,230	4,868	NA *
3rd Quarter	1,000	3,652	5,265	5,180	5,306	NA *
4th Quarter	2,526	4,848	6,271	4,235	4,335	NA *
Total	5,877	17,746	20,959	16,812	18,269	NA *

\* NA - Not Available.

The BOE audit disposal tonnage results and the origin survey week allocation percentages (for the County and the Town) for 1995 were used to determine the proposed corrected disposal tonnages for the County and the Town for 1995. The percentage allocation rates identified in Table 3-2 (from the County's QDR's) were used for deriving the proposed disposal quantities for 1996. Table 3-5 presents the results.

**Table 3-5. Proposed Disposal Quantities for the County and the Town for 1995 and 1996 (Benton Crossing Landfill)**

Period	1995				1996			
	Total	County	Town	% County	Total	County	Town	% Town
1st Quarter	4,298	473	3,825	11%	3,760	188	3,572	5%
2nd Quarter	4,948	148	4,800	3%	4,868	243	4,625	5%
3rd Quarter	3,652	292	3,360	8%	5,306	531	4,775	10%
4th Quarter	4,848	582	4,266	12%	4,335	564	3,771	13%
Total	17,746	1,495	16,251	8%	18,269	1,526	16,743	8%

#### 1999 DISPOSAL DATA CORRECTION

Additionally, corrected 1999 disposal information was very recently developed by and obtained from the County for the allocation of tonnage between the County and the Town for 1999 at the Benton Crossing Landfill. The

proposed correction is depicted in Table 3-6.

**Table 3-6. Corrected Disposal Tonnage for the Town for 1999**

Disposal Site	Previously Reported for 1999	Quarter				Corrected 1999 Total Disposal Tonnage
		1st	2nd	3rd	4th	
Benton Crossing	18,516	2,712	5,860	5,506	3,533	17,611

The calculated diversion rate using this corrected 1999 disposal amount is presented in Section 5.0.